

REMARKS

Claims 1-30 are pending in the Application and all were rejected in the Office action of July 17, 2007. Claims 1, 11, 16 and 24 are independent claims. Claims 2-10, 12-15, 17-23 and 25-30 depend either directly or indirectly from independent claims 1, 11, 16 and 24, respectively.

The Applicants respectfully request reconsideration of pending claims 1-30, in light of the following remarks.

Rejections of Claims

Claims 1-30 were rejected under 35 U.S.C. §103(a) as being anticipated by Moles et al. (US 6,615,038, hereinafter "Moles") in view of Shah (US 6,047,071). The Applicants respectfully traverse the rejection. Applicants respectfully submit that the claims define allowable subject matter, for at least the reasons set forth during prior prosecution, and for the reasons set forth below.

The Applicants respectfully submit that the Examiner has failed to establish a case of prima facie obviousness for at least the reasons provided below. M.P.E.P. §2142 clearly states that "[t]he examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness." The M.P.E.P. §2142 goes on to state that "[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure."

The Applicant notes that every claim rejection is based on obviousness. "In determining the differences between the prior art and the claims, the question under 35 U.S.C. 103 is **not** whether the differences themselves would have been obvious, but

whether the claimed invention as a whole would have been obvious.” MPEP at § 2141.02. The law is well settled that “obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion or incentive to do so.” *ACS Hospital Systems, Inc. v. Montfiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929 (Fed. Cir. 1984). It is not permissible to pick and choose among the individual elements of assorted prior art references to re-create the claimed invention, but rather “some teaching or suggestion in the references to support their use in the particular claimed combination” is needed. *Symbol Technologies, Inc. v. Opticon, Inc.* 935 F.2d 1569, 1576, 19 USPQ2d 1241 (Fed. Cir. 1991).

In *Ex parte Hiyamazi*, the Board of Patent Appeals and Interferences reversed a rejection based on a combination of references, stating, in part:

Under 35 USC § 103, where the Examiner has relied upon the teachings of several references, the test is whether or not the reference viewed individually and collectively would have suggested the claimed invention to the person possessing ordinary skill in the art. Note *In re Kaslow*, 707 F.2d 1366, 107 USPQ 1089 (Fed.Cir. 1983). **It is to be noted, however, that citing references which merely indicate the isolated elements and/or features recited in the claims are known is not a sufficient basis for concluding that the combination of claimed references would have been obvious.** That is to say, there should be something in the prior art or a convincing line of reasoning in the answer suggesting the desirability of combining the claimed invention. Note *In re Deminski*, 796 F.2d 436, 230 USPQ 313 (Fed.Cir. 1986).

Ex parte Hiyamazi, 10 USPQ2d 1393, 1394 (Bd. Pat. App. & Interf. 1988) (emphasis added).

The Applicant respectfully submits that the Office Action does not identify a proper motivation to combine the various references to reject the claims of the present application. Merely identifying isolated elements in the prior art is not enough to establish a *prima facie* case of obviousness, as shown below:

[M]ere identification in the prior art of each element is insufficient to defeat the patentability of the combined subject matter as a whole. [*In re Rouffet*, 149 F. 3d 1350] at

1355, 1357 [(Fed. Cir. 1998)]. Rather, to establish a *prima facie* case of obviousness based on a combination of elements disclosed in the prior art, the Board must articulate the basis on which it concludes that it would have been obvious to make the claimed invention. *Id.* In practice, this **requires** that the Board “explain the reasons one of ordinary skill in the art would have been motivated to select the references and to combine them to render the claimed invention obvious.” *Id.* at 1357-59. This entails consideration of both the “scope and content of the prior art” and “level of ordinary skill in the pertinent art” aspects of the Graham test.

When the Board does not explain the motivation, or the suggestion or teaching, that would have led the skilled artisan at the time of the invention to the claimed combination as a whole, we infer that the Board used hindsight to conclude that the invention was obvious. *Id.* at 1358.

See in re Kahn, 441 F.3d 977 (Fed. Cir. March 22, 2006) (emphasis added).

As the MPEP dictates, the “teaching or suggestion to make the claimed combination and the reasonable expectation of success must **both be found in the prior art, and not based on applicant’s disclosure.**” *See* Manual of Patent Examining Procedure (MPEP) at § 2142, citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added). The Applicant respectfully submits, however, that the Office Action merely cites portions of the various references that may, but do not necessarily, disclose isolated claim limitations. The Office Action’s statements regarding motivation to combine the references amount to no more than conclusory statements of convenient assumptions about one of ordinary skill in the art, which is a factual question that cannot be resolved on “subjective belief and unknown authority.” *See In re Lee*, 277 F.3d 1338, 1344 (Fed. Cir. 2002). The Office Action does not explain the motivation, suggestion, or teaching to combine the various references. Again, mere identification of isolated elements is not enough to establish a *prima facie* case of obviousness. “[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements.” *See in re Kahn*, 441 F.3d 977 (emphasis added).

As the Federal Circuit has held, the “factual inquiry whether to combine references must be thorough and searching.” *See, e.g., McGinley v. Franklin Sports, Inc.* 262 F.3d 1339, 1351-52 (Fed. Cir. 2001). “It must be based on objective evidence of record. This precedent has been reinforced in myriad decisions, and cannot be dispensed with.” *See In re Lee*, 277 F.3d at 1343 (internal citations omitted).

Federal Circuit “case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.” *In re Dembiczak*, 175 F.3d 994, 999 (Fed. Cir. 1999). The “examiner can satisfy the burden of showing obviousness of the combination ‘only by showing some **objective** teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teaching reference.’” *See in re Lee*, 277 F. 3d at 1343, citing *In re Fitch*, 972 F. 2d 1260, 1265 (Fed. Cir. 1992) (emphasis added).

Merely citing portions of separate and distinct references that may or may not disclose an isolated claim element, however, is not a proper identification of a motivation to combine. The law requires that the Office Action show an **objective** teaching to support the assertions regarding motivation to combine the references.

In *In re Lee*, the Federal Circuit noted that the “Board rejected the need for ‘any specific hint or suggestion in a particular reference’ to support the combination of ... references,” which was an “[o]mission of a relevant factor **required by precedent**” that was both “**legal error** and **arbitrary** agency action.” *See id.* at 1344, citing *Morot Vehicle Manufacturers Ass’n v. State Farm Mutual Automobile Ins. Co.*, 463 U.S. 29 at 43 (1983) (emphasis added).

Subjective opinion of “common knowledge” or “common sense” regarding a motivation to combine is not enough to establish a *prima facie* case of obviousness. The Applicant respectfully submits that the motivation to combine the references identified in the Office Action is based on subjective knowledge and convenient assumptions gleaned from Applicant’s disclosure, instead of the prior art (as is required

by the Federal Circuit). Thus, at least for these reasons, the Applicant respectfully submits that the claims should be in condition for allowance.

According to M.P.E.P. §2142, "[t]o reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made." In addition, the MPEP clearly states that "impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art." (emphasis added)

Applicants respectfully submit that the Office has failed to set forth any reasoned explanation of the process by which the Examiner came to identify the Moles and Shah references, any objective reasoning used to arrive at the combination of Moles and Shah, or any explanation of how Moles and Shah would be combined to render Applicants' invention. Applicants respectfully submit that the Moles references relates to "...in a wireless network comprising a group of base stations that communicate with a group of mobile stations, an apparatus for automatically gathering configuration data associated with the mobile stations." (Abstract) Applicants respectfully submit that the Shah reference relates "...generally to administration of parameters for operation of mobile telephones, and more specifically to a method for maintaining, changing, and/or updating of mobile phone parameters by a network service provider without requiring intervention by the mobile phone user." (underline added)(column 1, lines 5-10) Applicants respectfully submit that Moles fails to teach, suggest, or disclose anything with respect to the use of, or even a mention of, over-the-air parameter administration (OTAPA) or over-the-air service provisioning (OTASP), as taught by Shah, and Moles fails to teach or suggest the use of such a mechanism in the update of firmware or software in an electronic device. Shah, on the other hand, fails to teach, suggest, or disclose anything with respect to updating firmware or software, as taught by Moles. Indeed, Shah does not even mention firmware or software, or its update. Therefore, Applicants respectfully submit that the Office has failed to show where either Moles or Shah, or the knowledge available to one of ordinary skill in the art at the time the

invention was made, would lead one to combine Shah with Moles to arrive at the subject matter of Applicants' claims.

Applicants respectfully submit that the Office has failed to show some **objective** teaching in the prior art or that knowledge generally available to one of ordinary skill in the art that would lead that individual to combine the teachings of the Moles and Shah references. Because Moles does not contain any teachings related OTAPA or OTASP, and Shah does not contain any teachings related to the update of firmware or software, **Applicants are left to conclude that the suggestion to combine the Moles and Shah references came not from Moles and/or Shah, but from Applicants' disclosure.** Applicants respectfully submit that, in fact, Applicants identify the Shah reference on page 10 of Applicants' disclosure.

Again, in accordance with M.P.E.P. §2142, "[t]o reach a proper determination under 35 U.S.C. 103, the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made." In addition, the MPEP clearly states that "impermissible hindsight must be avoided and the legal conclusion **must be reached on the basis of the facts gleaned from the prior art.**" (emphasis added) Applicants' respectfully request that the Office reconsider and withdraw the rejection of claims 1-30 under 35 U.S.C. §103(a), for at least the reasons set forth above.

Notwithstanding the above, Applicants respond to the rejections of the Office action, as follows.

Regarding claim 1, the Applicants respectfully submit that the proposed combination of Moles and Shah fails to teach, suggest, or disclose, for example, "...[a] mobile electronic device network employing provisioning techniques for updating electronic devices, the network comprising a device server capable of dispensing at least one update; an electronic device having at least one of firmware and software, the electronic device being communicatively coupled to the device server; and an update service in the electronic device, presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates

to the network capability of the electronic device to update the at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software."

Applicants appreciate recognition by the Office that Moles does not disclose "... a network comprising an update service in the electronic device, presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates to the network capability of the electronic device to update at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software." (Office action at page 3) The Office action, however, alleges that Shah remedies the admitted shortcomings of Moles, and cites Shah at Abstract and at column 2, lines 30-60.

According to Shah, at the Abstract:

The procedure for Over-The-Air Parameter Administration (OTAPA) utilizes the over-the-air programming protocol and procedures which support the Over-The-Air Service Provisioning (OTASP) feature in accordance with established industry standards (TIA/EIA/IS-683). The mobile phone is programmed with a service option for changing the NAM parameters including an identification number for this option. The network base station sends a message to the mobile phone using the identification number and, if the mobile phone has OTAPA capability, it responds indicating support. The base station then transmits message telling the mobile station to proceed to the Traffic Channel and inquires whether the encryption mode is enabled, proceeding with the OTAPA only if the encryption mode is enabled. Once on the Traffic Channel, a Parameter Change Code (PCC) is sent. If the PCC is verified by the mobile unit, the base station proceeds to update the parameters and store the updated parameters into the phone's memory. After verification of the programmed data in accordance with OTASP processing, the process is terminated. No user intervention is required to initiate or conduct the OTAPA procedure.

The Applicants respectfully submit that the above portion of Shah, which was explicitly cited by the Office action, fails to teach or disclose anything with respect to the

update of firmware or software, and therefore fails to teach or suggest, at least, "...presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates to the network capability of the electronic device to update the at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software...", as recited in Applicants' claim 1. Applicants respectfully submit that instead, the cited portion of Shah teaches over-the-air parameter administration (OTAPA) of number assignment module (NAM) parameters, which is different from and does not teach or suggest the updating of firmware or software. Applicants respectfully submit that one of ordinary skill in the art would immediately and unquestioningly recognize that the update of firmware or software in an electronic device, as set forth in Applicants' claim 1, is considerably more complex than the mere storage of a parameter value in a NAM, as taught by Shah.

The Office action also cites Shah at column 2, lines 30-60 as teaching "... a network comprising an update service in the electronic device, presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates to the network capability of the electronic device to update at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software." Applicants respectfully disagree.

According to column 2, lines 30-60 of Shah:

In an exemplary embodiment of the present invention, the procedure for Over-The-Air Parameter Administration (OTAPA) utilizes the over-the-air programming protocol and procedures which support the Over-The-Air Service Provisioning (OTASP) feature in accordance with established industry standards (TIA/EIA/IS-683). The mobile phone is programmed with a service option for changing the NAM parameters--the Parameter Administration Service Option (PASO), which includes assignment of a PASO number. The mobile phone will also have one or more parameter change codes (PCCs) in its memory. The network possesses means for determining whether a mobile phone is

OTAPA capable. In this procedure, the network base station sends a General Page Message to the mobile phone using the PASO number. After first verifying its identity using the standard Authentication process, if the mobile phone has OTAPA capability, it responds with a Page Response Message, indicating support for the PASO by sending the PASO number. If the mobile station does not support the option, the response will indicate that the option is not available. Once the presence of the option is confirmed, the base station transmits a Channel Assignment Message, telling the mobile station to proceed to the Traffic Channel. For security reasons, the Signaling Message Encryption (SME) is used in the Channel Assignment Message. Use of encryption is enforced, and, where encryption is optional, if the encryption mode is not enabled, the mobile station will enter into the Service Negotiation process on the Traffic Channel and will request the other service option, indicating that the PASO is not supported, or will terminate the call according to the Call Release Procedure.

The Applicants respectfully submit that neither this portion of Shah, which was also explicitly cited by the Office action, nor any other portion or figure of Shah teaches or suggests anything with respect to the update of firmware or software, and that Shah therefore fails to teach or suggest, at least, "...presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates to the network capability of the electronic device to update the at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software...", as recited in Applicants' claim 1. Applicants respectfully submit that instead, the cited portion of Shah teaches over-the-air parameter administration (OTAPA) and over-the-air service provisioning (OTASP) features of IS-683 for programming parameters in a number assignment module (NAM), and the use of a parameter administration service option (PASO) number, which is different from and does not teach or suggest the updating of firmware or software. Applicants respectfully submit that the update of firmware or software in an electronic device, as set forth in Applicants' claim 1, is different from and does not teach or suggest the mere storage of a parameter value in a NAM, as taught by Shah.

Therefore, Applicants respectfully submit that Shah also fails to teach or suggest the admitted shortcomings of Moles, and that neither Moles nor Shah, nor the combination of Moles and Shah, teaches or suggests "...presence of the update service in the electronic device being determinable by the network, wherein when enabled the update service indicates to the network capability of the electronic device to update the at least one of firmware and software, electronic device employing the at least one update to update the at least one of firmware and software...", as recited in Applicants' claim 1.

Based at least upon the above, Applicants respectfully submit that the proposed combination of Moles and Shah fails to teach all of the limitations of Applicants' claim 1, as required by M.P.E.P. §2142, that the Office has failed establish a *prima facie* case of obviousness, and that a rejection of claim 1 under 35 U.S.C. §103(a) cannot be maintained.

Therefore, for at least the reasons set forth above, Applicants respectfully submit that Applicants' claim 1 is allowable over the proposed combination of Moles and Shah. Applicants respectfully submit that claim 1 is an independent claim. Because claims 2-10 depend either directly or indirectly from claim 1, Applicants respectfully submit that claims 2-10 are also allowable over Moles and Shah, as well. Therefore, the Applicants respectfully request that the rejection of claims 1-10 under 35 U.S.C. §103(a), be withdrawn.

With regard to claim 11, the Applicants respectfully submit that the proposed combination of Moles and Shah does not teach, suggest, or disclose, for example, "...[a] mobile electronic device network adapted to update electronic devices and perform over-the-air number assignment module parameter provisioning, the network comprising an electronic device comprising one of firmware and software, the electronic device also comprising number assignment module parameters, the electronic device being communicatively coupled to at least one server; and wherein presence of support for at least one of a firmware update service option and a software update service option in the electronic device is determinable by the network, wherein when enabled,

the presence of support for the at least one of a firmware update service option and a software update service option indicates to the network that the electronic device is capable of updating one of firmware and software, wherein the electronic device is adapted to communicate the presence of support for the one of the firmware update service option and software update service option to the network, and wherein the electronic device is also adapted to communicate device specifications to the network when the network attempts to provision the number assignment module parameters."

The Applicants appreciate recognition in the Office action that Moles does not disclose "...a network wherein presence of support for the at least one of a firmware update service option and a software update service option in the electronic device determinable by the network, wherein when enabled, the presence of support for the at least one of the firmware update service option and a software update service option indicates to the network that the electronic device is capable of updating one of firmware and software, wherein the electronic device is adapted to communicate the presence of support for the one of the firmware update service option and software update service option to the network." (Office action at page 12) The Office action, however, alleges that Shah remedies these admitted shortcomings of Moles, and cites Shah at Abstract and at column 3, lines 30-60. Applicants respectfully submit that column 3, lines 30-60 are unrelated to the issue of the rejection, and assume that the Examiner meant to cite column 2, lines 30-60. If Applicants' assumption is incorrect, Applicants respectfully request that Examiner contact Applicants representative, listed below. Applicants respectfully disagree with what the proposed combination of Moles and Shah allegedly teaches or suggests.

Applicants respectfully submit that the rejection of claim 11 relies on alleged teaching of Shah (i.e., Abstract and column 2, lines 30-60) that Applicants addressed above with respect to claim 1. Applicants respectfully submit that Shah fails to remedy the shortcomings of Moles, for at least the reasons set forth above with respect to the rejection of claim 1. Applicants therefore respectfully submit that the proposed combination of Moles and Shah fails to teach or suggest all of the limitations of

Applicants' claim 11, as required by M.P.E.P. §2142, and that a rejection of claim 11 under 35 U.S.C. §103(a) cannot stand.

Therefore, for at least the above stated reasons, the Applicants respectfully submit that Applicants' claim 11 is allowable over the proposed combination of Moles and Shah. Applicants respectfully submit that claim 11 is an independent claim. Because claims 12-15 depend either directly or indirectly from claim 11, Applicants respectfully submit that claims 12-15 are allowable over Moles and Shah, as well. Therefore, the Applicants respectfully request that the rejection of claims 12-15 under 35 U.S.C. §103(a), be withdrawn.

With regard to claim 16, Applicants respectfully submit that the combination of Moles and Shah fails to teach, suggest, or disclose, for example, "...[a] method of updating software in a wireless communication device in a wireless network, the method comprising determining a value of one of a firmware update service option number and a software update service option number in the wireless communication device by the wireless network; and downloading one of a firmware update and a software update from a server in the wireless network, if one of the firmware update service option number and the software update service option number is determined to have a predetermined value."

The Applicants appreciate recognition in the Office action that Moles does not disclose "...determining a value of one of a firmware update service option and a software update service option in the wireless communication device by the wireless network, and downloading an update from a server if one of the firmware update service option number is determined to have a predetermined value." The Office action, however, alleges that Shah remedies the admitted shortcomings of Moles, and cites Shah at Abstract and at column 2, lines 30-60. Applicants respectfully disagree.

Applicants respectfully submit that the rejection of claim 16 relies on alleged teaching of Shah (i.e., Abstract and column 2, lines 30-60) that Applicants addressed above with respect to claims 1 and 11. Applicants respectfully submit that Shah fails to remedy the shortcomings of Moles, for at least the reasons set forth above with respect

to the rejection of claims 1 and 11. Applicants therefore respectfully submit that the proposed combination of Moles and Shah fails to teach or suggest all of the limitations of Applicants' claim 16, as required by M.P.E.P. §2142, and that a rejection of claim 16 under 35 U.S.C. §103(a) cannot stand.

Therefore, for at least the above stated reasons, the Applicants respectfully submit that Applicants' claim 16 is allowable over the proposed combination of Moles and Shah. Applicants respectfully submit that claim 16 is an independent claim. Because claims 17-23 depend either directly or indirectly from claim 11, Applicants respectfully submit that claims 17-23 are allowable over Moles and Shah, as well. Therefore, the Applicants respectfully request that the rejection of claims 17-23 under 35 U.S.C. §103(a), be withdrawn.

With regard to claim 24, Applicants respectfully submit that the combination of Moles and Shah fails to teach, suggest, or disclose, for example, "...[a] computer-readable storage, having stored thereon a computer program having a plurality of code sections enabling over-the-air updating of at least one of firmware and software in an electronic device via a wireless network, the code sections executable by a processor for causing the processor to perform the operations comprising: receiving at least one message from a server over the wireless network as part of an over the air parameter administration process, the message comprising a service option parameter; determining whether a value of the service option parameter corresponds to one of a firmware update service option and a software update service option; and engaging in over the air updating of the at least one of firmware and software of the electronic device via the wireless network, if it is determined that the value of the service option parameter corresponds to the one of a firmware update service option and a software update service option."

The Applicants appreciate recognition in the Office action that Moles does not disclose "...a storage comprising: receiving at least one message from a server over the wireless network as part of an over the air parameter administration process, the message comprising a service option parameter; determining whether a value of the

service option parameter corresponds to one of a firmware update service option and a software update service option; and engaging in over the air updating of the at least one of firmware and software of the electronic device via the wireless network, if it is determined that the value of the service option parameter corresponds to the one of a firmware update service option and a software update service option.” The Office action, however, alleges that Shah remedies these admitted shortcomings of Moles, and repeatedly cites Shah at Abstract and at column 2, lines 30-60, as teaching the missing elements. Applicants respectfully disagree.

Applicants respectfully submit that the rejection of claim 24 relies on alleged teaching of Shah (i.e., Abstract and column 2, lines 30-60) that Applicants addressed above with respect to claims 1, 11, and 16. Applicants respectfully submit that Shah fails to remedy the admitted shortcomings of Moles, for at least the reasons set forth above with respect to the rejection of claims 1, 11, and 16. Applicants therefore respectfully submit that the proposed combination of Moles and Shah fails to teach or suggest all of the limitations of Applicants’ claim 24, as required by M.P.E.P. §2142, and that a rejection of claim 24 under 35 U.S.C. §103(a) cannot stand.

Therefore, for at least the above stated reasons, the Applicants respectfully submit that Applicants’ claim 24 is allowable over the proposed combination of Moles and Shah. Applicants respectfully submit that claim 24 is an independent claim. Because claims 25-30 depend either directly or indirectly from claim 24, Applicants respectfully submit that claims 25-30 are allowable over Moles and Shah, as well. Therefore, the Applicants respectfully request that the rejection of claims 24-30 under 35 U.S.C. §103(a), be withdrawn.

Conclusion

In general, the Office Action mailed makes various statements regarding claims 1-30 of the Application and the cited references that are now moot in light of the above. Thus, Applicants will not address such statements at the present time. However, Applicants expressly reserve the right to challenge such statements in the future should the need arise (e.g., if such statements should become relevant by appearing in a rejection of any current or future claim).

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The Applicants believe that all of pending claims 1-30 are in condition for allowance. Should the Examiner disagree or have any questions regarding this submission, the Applicants invite the Examiner to telephone the undersigned at (312) 775-8000.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

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